

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,

v.

ABN AMRO RETAINED NOMINEES (IOM)
LIMITED, f/k/a ABN AMRO Fund Services
(Isle of Man) Nominees, and f/k/a Fortis (Isle
of Man) Nominees Limited, and PLATINUM
ALL WEATHER FUND LIMITED,

Defendants.

Adv. Pro. No. 12-01697 (CGM)

**DECLARATION OF REGINA GRIFFIN
IN SUPPORT OF TRUSTEE'S MEMORANDUM OF LAW IN OPPOSITION TO
ABN AMRO RETAINED NOMINEES (IOM) LIMITED'S MOTION TO DISMISS**

I, Regina Griffin, declare the following:

1. I am a member of the New York Bar and partner with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard (the “Trustee”), as Trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-*III*, and the chapter 7 estate of Bernard L. Madoff.

2. I submit this Declaration in support of the Trustee’s Memorandum of Law in Opposition to Defendant ABN Amro Retained Nominees (IOM) Limited (“Fortis (IOM)”) Motion to Dismiss.

3. The documents attached to this Declaration are from various productions made to the Trustee. The Trustee’s records indicate that the producing parties have de-designated the documents as not confidential under the Litigation Protective Order entered in this liquidation. *See SIPC v. BLMIS (In re BLMIS)*, Adv. Pro. No. 08-01789 (CGM) (Bankr. S.D.N.Y. June 6, 2011 & Sept. 17, 2013), ECF Nos. 4137 & 5474. To the extent applicable, all personally identifiable information has been redacted.

4. Attached as **Exhibit 1** is a true and correct copy of the Fairfield Sentry Private Placement Memorandum dated August 14, 2006. (SECSEV3005218).

5. Attached as **Exhibit 2** is a true and correct copy of the Fairfield Sigma Private Placement Memorandum dated February 16, 2006. (SECSEV2391799).

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: March 13, 2023
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Regina Griffin
Regina Griffin